LTCC REBUTTAL EXHIBIT 1

Rebuttal Panel Testimony of Rebecca Sommi, Robert Bailey,
Valerie Cardwell and Christoph Winkelmann
On behalf of Broadview, Choice One, Covad and XO
D.T.E. 03-60
February 6, 2004

FCC Loop and Transport Triggers								
Capacity	Loop Triggers		Transport Triggers					
	Self-provisioned deployment	Competitive wholesale facilities	Self-provisioned deployment	Competitive wholesale facilities				
DS1	Does not apply	Two or more unaffiliated providers have deployed their own loops to a customer location and offer DS1 loops over its own facilities on a widely available basis. Each wholesale provider must have access to the entire customer location, including each individual unit within that location. §51.319(a)(4)(ii).	Does not apply	Two or more unaffiliated providers (A) have deployed their own DS1 facilities along the route and are operationally ready to use those facilities to provide DS1 transport on the route; (B) are willing immediately to provide on a widely available basis, dedicated DS1 transport along the route; (C) have facilities that terminate in a collocation arrangement at each end of the route; and (D) requesting telecommunications carriers have reasonable and non-discriminatory access to the unaffiliated provider's facilities through a cross-connect to the competing provider's collocation arrangement. §51.319(e)(1)(ii).				

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Capacity	Loop Triggers		Transport Triggers				
	Self-provisioned deployment	Competitive wholesale facilities	Self-provisioned deployment	Competitive wholesale facilities			
DS3	Two or more unaffiliated providers have deployed their own loops to a customer location and are serving customers at a DS3 level via those facilities. §51.319(a)(5)(i)(A).	Two or more unaffiliated providers have deployed their own loops to a customer location and offer DS3 loops over its own facilities on a widely available basis. Each wholesale provider must have access to the entire customer location, including each individual unit within that location. §51.319(a)(5)(i)(B).	Three or more unaffiliated providers have deployed their own DS3 facilities along the route, are collocated on both ends of the route and are operationally ready to use those facilities to provide DS3 transport between the collocation facilities on the route. §51.319(e)(2)(i)(A).	Two or more unaffiliated providers (A) have deployed their own DS3 facilities along the route and are operationally ready to use those facilities to provide DS3 transport on the route; (B) are willing immediately to provide on a widely available basis, dedicated DS3 transport along the route; (C) have facilities that terminate in a collocation arrangement at each end of the route; and (D) requesting telecommunications carriers have reasonable and non-discriminatory access to the unaffiliated provider's facilities through a cross-connect to the competing provider's collocation arrangement. §51.319(e)(2)(i)(B).			

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Capacity	Loop Triggers		Transport Triggers					
	Self-provisioned deployment	Competitive wholesale facilities	Self-provisioned deployment	Competitive wholesale facilities				
Dark fiber	Two or more unaffiliated providers have deployed their own dark fiber loops to a customer location. §51.319(a)(6)(i).	Does not apply	Three or more unaffiliated providers have deployed their own dark fiber facilities and the facilities terminate in a collocation arrangement at each end of the transport route. §51.319(e)(3)(i)(A).	Two or more unaffiliated providers (A) have deployed their own dark fiber along the route and are operationally ready to lease or sell those facilities for the provision of fiber-based transport on the route; (B) are willing immediately to provide on a widely available basis, dark fiber along the route; (C) have facilities that terminate in a collocation arrangement at each end of the route; and (D) requesting telecommunications carriers have reasonable and non-discriminatory access to the unaffiliated provider's dark fiber through a cross-connect to the competing provider's collocation arrangement. §51.319(e)(3)(i)(B)				